

JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD, PLAINTIFFS
JINGER VUOLO, and JOY DUGGAR

V. CASE NO. 5:17-CV-05089-TLB

CITY OF SPRINGDALE, ARKANSAS; DEFENDANTS

WASHINGTON COUNTY, ARKANSAS;

KATHY O'KELLEY, in her individual and
official capacities;

ERNEST CATE, in his individual and official
capacities; RICK HOYT, in his individual and
official capacities; STEVE ZEGA, in his official
capacity; DOES 1-10, inclusive

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
JOY ANNA DUGGAR FORSYTH
AUGUST 30, 2021

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION
of JOY ANNA DUGGAR FORSYTH, produced as a witness at the
instance of the Defendants, and duly sworn, was taken in
the above-styled and numbered cause on the 30th day of
August, 2021, from 10:01 a.m. to 3:38 p.m., before
Natanya Riddle, CCR in and for the State of Arkansas,
reported by machine shorthand method in Fayetteville,
Arkansas (virtually), pursuant to the Federal Rules of
Civil Procedure and the provisions stated on the record.

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EXHIBIT

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1 A. Do I need to say their names?

2 Q. Yes, please.

3 A. I know of one for sure, Jim and Bobye Holt. And --
4 I mean, I can't -- I know there were families in and
5 out. That's the one that I know for sure. I don't
6 really -- there's other people that visited for times,
7 but I don't know if they were there during that time.

8 Q. Did Jim Holt run for office at some point?

9 A. Yes.

10 Q. I just want to make sure it was the same Jim Holt I
11 was thinking of.

12 Okay. Was he a good friend of your
13 dad's?

14 A. Yes.

15 Q. Your dad ran for office and was elected at one
16 point, wasn't he? A representative or something?

17 A. Yes.

18 Q. Okay. Did y'all have a name for the home church at
19 your house?

20 A. It wasn't official. Bible -- Bible Baptist Church,
21 maybe. I don't remember -- like, it wasn't an actual
22 name. We just kind of made it up.

23 Q. I understand.

24 Did the church have any paid staff of any
25 kind?

1 A. No.

2 Q. So how regularly did y'all meet as a church?

3 A. Every Sunday.

4 Q. And would someone from the church speak, like give
5 a sermon?

6 A. Sometimes.

7 Q. What was the normal meeting -- Sunday meeting of
8 the church? What did that look like?

9 A. We would either watch a video, like a sermon, like
10 a video, or somebody would preach and we would eat lunch
11 together.

12 Q. Okay. My recollection was that y'all built -- the
13 family built a big new house at some point.

14 Do you remember when that was; how old
15 you were when that was completed?

16 A. When it was completed? I think it was on my
17 brother's 12th birthday or 10th birthday. So I would
18 have been either eight or ten.

19 Q. Okay.

20 A. I should know that.

21 Q. Y'all didn't move into that house until after all
22 of this had happened, right?

23 A. Yes.

24 Q. [REDACTED]

25 [REDACTED]

1 A. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 Q. Yeah. So who -- who would that have been? Would
8 that have been Mrs. Holt?

9 A. No. Honestly, I don't remember names. It
10 wasn't -- it wasn't like -- it was more of like I was
11 there and I would just talk to them. It wasn't like a
12 set up thing.

13 Q. Sure.

14 Are we talking about, like, general life
15 advice or did y'all get into the facts of and the
16 fallout from the molestation?

17 A. No, just general life advice. I -- I never talked
18 about what had happened to anybody really.

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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Q. Okay. When did the television show start? How old were you when the television show started?

A. I was six, I think.

Q. Do you recall whether the television show started before or after these interviews?

A. I don't recall.

Q. Okay. Do you remember when your parents first started talking about "They may want to do a television show of us"?

A. Sorry. Just a second.

Q. I notice you're looking at -- are you looking at a file on your computer?

A. No. My -- my computer -- it went to a short -- I'm not looking at a file. Sorry. I'm trying to open up the full screen.

Q. Oh, I see. You're trying to rearrange your Zoom. Gotcha.

A. It cut off. Some, like, update came up on my computer. There we go. Sorry.

Q. Sure. No, no problem.

Do you remember when your parents told

1 you that, "Hey, somebody wants to do a television show
2 of our family"?

3 A. I want to say I vaguely remember, but it may have
4 just been, like, me remembering my dad talking about it,
5 like, telling the story.

6 Q. Okay. Okay. And so it began at six years old and
7 has just recently -- the show has just recently been
8 canceled, hasn't it?

9 A. Yes.

10 Q. Fair to say that almost all of your life you have
11 been on TV?

12 A. Yeah.

13 Q. How has that been generally? I'm talking about
14 over the last 15 years. Has it been an enjoyable
15 experience, a terrible experience, somewhere in the
16 middle?

17 MR. BLEDSOE: Object to form.

18 Q. (BY MR. OWENS) You can go ahead and answer. He's
19 just registering his objection.

20 A. Sorry. A little of both, I guess. It can be --
21 it's had its hard times and its, like, good times, fun
22 times.

23 Q. So what -- what are the good parts of being on TV
24 for most of your -- most of your life?

25 A. Our film crew was like family. We -- we had a lot

JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021

27

1 it's going to be released," and my dad came and told all
2 of us girls. He's like, "I'm so sorry. There's nothing
3 we can do. I've tried to talk to them, and they're
4 going to release this."

5 So I think it was that -- the same day, he
6 told us.

7 Q. It was released the same day -- as you understand
8 it, it was released the same day he came and talked to
9 you?

10 A. Yes. Either that day or the following morning. I
11 can't remember correctly.

12 Q. When he said, "We tried to talk to them," did he
13 indicate who he had tried to talk to?

14 A. I don't remember names. I know whoever notified
15 him is the person that he had talked to.

16 Q. I see. Did y'all have an agent at that time?

17 A. I personally did not. My family as a whole did,
18 though.

19 Q. Who was that?

20 A. Chad Gallagher. He was our PR guy.

21 Q. Okay. Is -- is he the one that notified your dad
22 about the report's imminent release?

23 A. No. I think it was -- I think it was somebody
24 else.

25 Q. Okay. What do you remember about the disclosure



1 There was, you know, friends, like, kind of questioning
2 the church or, you know, events, like, didn't really
3 know -- awkward, kind of like what's going on. So there
4 was definitely -- you know, you could tell there was
5 stuff in the air that people were just confused about
6 and awkward.

7 Q. Sure. Do you remember any of the people who spoke
8 with you?

9 A. Not names specifically. And they didn't really
10 ask. It was -- you know, it's nothing you want to talk
11 about.

12 Q. Sure. Did you go online and look at any of the
13 reports or anything?

14 A. No, sir.

15 Q. Have you ever done that since then?

16 A. I did a couple years ago.

17 Q. Okay. And what did you find when you -- when you
18 looked them up a couple years ago?

19 A. I found our, you know, word-for-word reports, all
20 the things that we said as, you know, young girls and --
21 yeah, everything was on there pretty much.

22 Q. Yeah. Did you -- did you see your name in any of
23 those reports?

24 A. No, sir.

25 Q. In your complaint there's an allegation that there

1 Q. Okay. Have you ever talked about your molestation
2 by Josh in any other form other than this interview --

3 A. No.

4 Q. -- with the state police?

5 A. No.

6 Q. Okay. As part of this lawsuit, you gave -- were
7 interviewed by the psychologist that's been retained to
8 give testimony in this case.

9 Is everything you told him still correct
10 as we sit here -- true and correct as we sit here today?

11 A. Yes.

12 MR. BLEDSOE: Object to the form.

13 You can answer.

14 THE WITNESS: Oh, sorry.

15 A. Yes.

16 Q. (BY MR. OWENS) Okay. You told him a little bit
17 about what you experienced after these disclosures and
18 whatever publications occurred as being paparazzi
19 appearing and people sort of being awkward around you,
20 which you attributed to this disclosure, right?

21 MR. BLEDSOE: Object to the form.

22 Q. (BY MR. OWENS) Did I get all that correct?

23 A. Yes.

24 MR. BLEDSOE: Object to the form.

25 Q. (BY MR. OWENS) Was there anything else that

1 occurred that was problematic for you after these
2 disclosures that you would attribute to the disclosures?

3 MR. BLEDSOE: Object to the form.

4 A. Can you be more specific than that, I guess?

5 Q. (BY MR. OWENS) Sure.

6 So my understanding of this lawsuit is
7 that you and your sisters are blaming some negative
8 effects in your life on the disclosure of these reports
9 by Springdale and Washington County. Is that fair?

10 A. Yeah.

11 Q. I just want to know what those negative effects
12 are. You mentioned paparazzi and people being awkward
13 around you.

14 Anything else?

15 MR. BLEDSOE: Object to the form.

16 A. You mean like long-term, like, still today --

17 Q. (BY MR. OWENS) Sure.

18 A. -- or at the time?

19 I know there's -- I think it's hard
20 because there was a lot of things that, you know, you
21 don't have to tell the world everything, and I feel like
22 people right after were, like, "Oh, well, y'all were
23 hiding stuff," and, you know, they look at you
24 completely different and making us feel like it was our
25 fault for -- and then the paparazzi following us around

1 and we had to move for a whole month just to be away
2 from it all. Now, as an adult, I lose marketing and ads
3 all the time because people don't want to be associated
4 with us because a lot of that is -- every time you type
5 in our name, "Duggar," all of that comes up. And
6 there's -- there are a lot of lasting effects.

7 Q. What about at the time? Anything else at the time?

8 A. At the time, as a 16-year-old, you know, you're --
9 you're still trying to, you know, find confidence in who
10 you are as a person and it was really hard, you know,
11 because we had -- we were just moving to a new church,
12 new friends; and for all of that to be out there for
13 everybody to see -- and what really hurt was, I guess,
14 my -- knowing the whole world knew my word-for-word --
15 it was really hard and the report -- it just -- the
16 things that -- the most private things in my life
17 like -- I feel like, you know, every part of our life
18 was out there except, you know, like a few things that
19 we felt like we should keep private. And it was really
20 hard. And I feel like it took me a long while to, you
21 know, get through that as a -- as a person and as a
22 whole family just moving forward.

23 Q. You said it took you a while to get through all
24 that. Do you feel like you have gotten through all that
25 at this point?



1 A. I would say through the grunt of it, but, you know,
2 there's still hard times when it still is hard. Like,
3 people smear things in your face and try to make you
4 feel like it's your fault or...

5 Q. Who made you feel like any of this is your fault?

6 A. People -- people online. You know, I try --
7 there's -- I still get texts today from my social medias
8 of people. And I finally just had to go in and, you
9 know, block words because people would -- to where they
10 couldn't send me messages. Just because of choices
11 that, you know, we make, I guess, or -- I don't know.
12 But I still have people, like, on my social medias that
13 will text me, you know, mean things about it or -- and
14 it's -- it still happens, you know, almost weekly.

15 Q. To your knowledge, have you ever met Rick Hoyt?

16 A. I don't remember.

17 Q. How about Steve Zega? Ever met him, to your
18 knowledge?

19 A. I don't remember.

20 Q. Okay. Ernest Cate? Have you ever met Ernest Cate?

21 A. I don't remember.

22 Q. Kathy O'Kelley, have you ever met her?

23 A. I don't remember.

24 Q. Okay. This disclosure occurred in 2015. And
25 you've told us a little bit about the effect that had on

1 on your behalf to give testimony in this case, do you
2 recall filling out a number of forms?

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11 MR. BLEDSOE: Object to the form.

12 A. Sorry. Can you ask that again?

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18 A. Yes, all true and correct.

19 Q. I'm sorry. I asked a compound question. I
20 apologize.

21 A. It's fine.

22 Q. As a result of disclosures in this case, you didn't
23 suffer any physical injury, did you?

24 MR. BLEDSOE: Object to the form. Calls
25 for expert analysis.

1 Q. (BY MR. OWENS) You may answer.

2 A. Oh, okay. "Physical" as being, like, bodily or,
3 like, monetarily or...

4 Q. Well, let's take them in turn.

5 How about bodily first?

6 A. No.

7 Q. How about monetarily?

8 A. Yes.

9 MR. BLEDSOE: Object to the form.

10 Q. (BY MR. OWENS) What monetary injuries have you
11 suffered as a result of these disclosures?

12 A. Uncounted number of -- I do advertising online and
13 I have lost multiple deals because of it, being a
14 majority of them, actually.

15 Q. Okay. So I asked you before if you worked outside
16 the home and you -- you told me no, and that's because
17 you work inside the home?

18 A. Yes, I guess, yeah. I work from home.

19 Q. That's okay. So what do you do for income?

20 A. I do advertising on -- online.

21 Q. How does that work? I've always been a little bit
22 curious about that. How does that work?

23 A. I have companies -- either I reach out to companies
24 or they reach out to me and -- to promote different
25 products.

JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021

64

1 Q. What kinds of products?

2 A. Could be beauty, could be, you know, baby stuff,
3 home supplies, electronics, pretty much anything.

4 Q. And what's your role in marketing or promoting
5 those products?

6 A. I normally take pictures and post them with, like,
7 links for people to -- to use to get, you know, a
8 discount.

9 Q. Okay. Okay.

10 AUTOMATED MESSAGE: It's 12:00 o'clock.

11 Q. (BY MR. OWENS) How long have you been doing that?

12 A. I've been doing that since I was -- I think I was
13 almost 18.

14 Q. Okay. So any other sources of income for you
15 personally?

16 A. Nothing huge, I guess, no. I do some YouTube
17 videos just on, like, DIY projects or family life, but
18 other than that, no.

19 Q. And my understanding is -- because I've never done
20 this. My understanding is that YouTube pays based on
21 the number of views. If you have a really large number
22 of views, they pay you some amount, right?

23 A. Yeah, depending on if you have ads on there or not.

24 Q. I see. Okay.

25 What was your income for 2020, just



1 ballpark?

2 A. Just for me?

3 Q. Yeah.

4 A. It was probably around 40,000.

5 Q. Okay. Your -- how did that compare to the years
6 before that?

7 MR. BLEDSOE: Object to the form.

8 Q. (BY MR. OWENS) Has it built up over time?

9 A. Pardon?

10 Q. Has that built up over time?

11 A. Because I've been proactive in it, it has. But
12 it's also really hard to get new people to do
13 advertisings with me. Or they'll -- they'll start and
14 then they'll cut it off.

15 Q. Okay. Okay. Your husband works as well?

16 A. Yes, sir.

17 Q. What does he do?

18 A. He's a commercial contractor.

19 Q. Oh, okay. There in Northwest Arkansas?

20 A. Yes, sir.

21 Q. Okay. What's the name of his company?

22 A. Red Oak Homes. He builds new homes right now.

23 Q. Oh, I see. Okay. Residential construction?

24 A. Yes, sir.

25 Q. Okay.

1 let's say, since you got married?

2 A. It's different. It's not a bad different, but it's
3 different, yeah.

4 Q. How is it different?

5 A. Well, not living in the house and I have my own --
6 you know, my own schedule and we don't talk as much, but
7 it's been -- but it's not like -- it's not worse, I
8 guess, or, like, bad at all.

9 Q. There have been some press articles about how
10 various members of the family, children, have kind of
11 marked out their own life and adulthood and -- and I
12 couldn't tell from the articles whether speculating or
13 had some information about estrangement from the parents
14 because, you know, some of the kids chose to wear blue
15 jeans or, you know, things like that.

16 Has there been any of that with --
17 between you and your parents?

18 A. No.

19 MR. BLEDSOE: Object to the form.

20 A. My parents and I have a great relationship. We go
21 to church together and -- I mean, I think, you know, as
22 our own family, we're going to have, you know, differing
23 opinions, but it's not that we don't speak or we don't
24 do things together because of that. Like, that's just a
25 part of growing up.

1 Q. (BY MR. OWENS) Sure.

2 A. People just make their speculations.

3 Q. Yeah. Been nothing negative that you've seen about
4 these sort of what you would classify as minor
5 disagreements --

6 A. Yeah.

7 Q. -- from your perspective?

8 A. Yeah.

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13 A. Yeah.

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MR. BLEDSOE: Object to form.

15 Q. (BY MR. OWENS) Have you ever talked with your
16 husband about your molestation?

17 A. I -- he was the only -- yeah, the first person that
18 I talked to when we were barely -- fairly newly dating.
19 I told him what had happened.

20 Q. Dating is one of those things in the Duggar family
21 that seems different from -- from a lot of other folks,
22 I'll say.

23 Did you know at the time that you talked
24 to him, you were pretty confident that the two of y'all
25 were going to be together?

1 A. Yes.

2 Q. You said your parents go to church with you.

3 They're now going to the same church with you?

4 A. Yes.

5 Q. Okay. Do any of your other family members go
6 there?

7 A. Yeah, the ones that live at home and two of my
8 married brothers. I think. Maybe three.

9 Q. I see these reports from the psychologist and the
10 forms that you completed.

11 In your view, did anything about you
12 change after the disclosures?

13 MR. BLEDSOE: Object to the form.

14 A. Yes, but --

15 Q. (BY MR. OWENS) What would that be?

16 A. -- I guess I wouldn't know necessarily how I would
17 be different because I -- I -- you know, I am different,
18 if that makes sense. Like, I don't know -- I don't
19 know, like, what part of me would be different because
20 I've never experienced the other side of not -- it not
21 being released.

22 Q. Sure. I got you.

23 We all grow and change as we get older,
24 right?

25 MR. BLEDSOE: Objection to the form.

1 Q. Gotcha. And he operates Legacy Consulting as his
2 business that -- when he does representation on it,
3 correct?

4 A. I think so, yeah.

5 Q. Okay. Since you've been on your own social media,
6 but, also, I wanted to ask just with other media
7 included, have you been the victim or the subject of
8 false rumors or false reports --

9 A. Yes.

10 Q. -- in the past?

11 MR. BLEDSOE: Object to the form.

12 Q. (BY MR. KIEKLAK) Okay. Do any of those come to
13 mind that you recall happening?

14 A. Yes.

15 Q. Tell me about that.

16 A. As far as, like, I guess on covering everything,
17 I've had -- I mean, when Austin and I were dating,
18 people said, you know, we were sleeping together or we
19 had our baby out of wedlock or those kind of rumors
20 that, like, they're always looking for stuff to write
21 about or...

22 Q. People were actually counting the days, weren't
23 they?

24 A. Yes.

25 Q. Yeah, from your marriage to your child, yes.

JILL DILLARD V. CITY OF SPRINGDALE
DUGGAR, JOY on 08/30/2021

128

1 A. I don't know.

2 Q. Or Steve Zega?

3 A. I don't know.

4 Q. Did Kathy O'Kelley put the redacted report on the
5 Internet, to your knowledge?

6 A. No.

7 Q. Did Ernest Cate put it on the Internet, to your
8 knowledge?

9 A. I don't know.

10 Q. Who have you told, if anyone, that you, Joy, are
11 one of the people discussed in that report -- redacted
12 report?

13 A. After it was released?

14 Q. Yes, ma'am.

15 A. I -- I didn't tell anybody that. I mean, no.

16 Q. Have you, to this day, ever told anyone -- let's
17 say besides your husband -- you mentioned your husband,
18 but have you ever told anyone besides your husband and
19 your lawyers that you are the person -- you're one of
20 the people discussed in that redacted report that was
21 released?

22 A. No. I mean, no.

23 Q. Okay. I believe some of your sisters have done
24 that. They have confirmed that they -- they were some
25 of the people that were discussed in the report.



1 A. No.

2 Q. (BY MR. KIEKLAK) So in the discussions, are you
3 just discussing that it, in fact, happened, these things
4 have happened?

5 A. Yeah.

6 Q. Ms. Forsyth, did you see -- in the context of
7 Josh's most recent arrest, did you observe, in your own
8 social media, any increase in the frequency of ugly or
9 negative posting to you and your family? I shouldn't
10 speak of your family. Just to you.

11 A. Yes.

12 Q. You had mentioned to me and to Mr. Owens about how
13 you are -- I guess your work inside the home. You
14 talked about your work outside and inside the home is
15 the sort of the advertising and marketing you do on
16 social media.

17 Are you -- and you mentioned to me that
18 you have a new representation.

19 A. Yeah.

20 Q. Is that something that you hope to grow? And do
21 you have a goal in mind?

22 A. I -- I'm kind of just working with, like, the
23 followers that I have. I'm not looking to grow it
24 and -- because you have to put a lot of work into that.
25 And our reasoning for getting off the show was to kind

1 of not be out there all the time. And so, anyway,
2 that's kind of where we're at.

3 Q. By not being out there all the time, Ms. Forsyth,
4 do you think that was the right decision for you and
5 your family?

6 MR. BLEDSOE: Object to form.

7 A. Yes, sir.

8 Q. (BY MR. KIEKLAK) In other words, you don't regret
9 that decision that you and your husband made, to pull
10 back from that sort of exposure?

11 A. No, we don't regret it.

12 Q. And so the interaction that you do now on social
13 media and that work that you mentioned, it's fair to say
14 that you want that to continue, but you don't have a
15 goal, whether it be a number of -- of followers or a
16 certain amount of money that you'd like to make per year
17 doing that?

18 A. Yeah.

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22 When you say "outdoors," do you mean,
23 like, in the yard or do you mean, like, out in the
24 woods, out in the country and such?

25 A. Anywhere we can get outdoors, I guess, yeah. Both.